

EXHIBIT B

Subject: Re: AI v. Adorama (Amicon Documents)

Date: Monday, November 4, 2013 at 11:47:03 AM Eastern Standard Time

From: Denise L. Savage

To: Daniel J. Brown, Ken Norwick

CC: Matt Sheppe

Dan and Matt:

That you even send such an email as below in the face of Mr. Schmelkin's testimony last Friday is preposterous.

Mr. Schmelkin testified that AI had produced all documents which it had in its possession, custody and control that had been created by its contractual relationship with Amicon on the Adorama site.

Mr. Schmelkin then testified that Amicon is a wholly separate entity, located in Mubai, in which there are no shared shareholders, officers, employees or directors with AI. Further, Mr. Schmelkin testified that he has absolutely no access, possession, custody or control over any data or documents that are Amicon's business property, other than any shared documents that have already been produced.

As such, your allegation that AI had a duty to obtain documents from Amicon (an unrelated, third party entity) is utterly ludicrous.

If you file a motion with the court to compel production from AI of documents over which it had no possession, custody or control, and for which it had no independent duty to serve said unrelated, third party with a production request to obtain such documents, we will most certainly seek sanctions against your firm and the Defendants, as such a motion would truly be frivolous. The bottom line is that Adorama should have served Amicon with its own production request and it failed to do so. Now, after being in possession of documents relating to Amicon since last January and February, and having sat on its hands, Adorama now seeks to use this frivolous argument to shift a burden or duty to AI which the FRCP do not place on any such party. The Plaintiffs will not abide by, nor comply, with such an asinine argument

Please govern yourselves accordingly.

Denise L. Savage, Esq.

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From: "Daniel J. Brown" <dbrown@reisssheppe.com>
Date: Thursday, October 31, 2013 at 3:37 PM
To: denise savage <dsavage@savagelitigation.com>, "ken@norwickschad.com" <ken@norwickschad.com>
Cc: Matt Sheppe <msheppe@reisssheppe.com>
Subject: Al v. Adorama (Amicon Documents)

Dear Denise,

We are writing because we have reviewed Plaintiffs' document production and believe that it is deficient in that Plaintiffs have withheld the full scope of documents in their possession, custody and/or control concerning coding work performed by Amicon on the Adorama project. Specifically, during yesterday's deposition of Mr. Schmelkin, Mr. Schmelkin acknowledged that Amicon performed a "substantial" amount of coding on the Adorama project and that he believed there were several instances where he was required to complain about the quality of Amicon's work aside from the October 2011 document introduced during his deposition. Therefore, Defendants demand that Plaintiffs immediately produce all documents in their possession regarding Amicon's coding work on the Adorama project, including without limitation other complaints between and among Plaintiffs and Amicon concerning the Adorama project and the quality of Amicon's work product, and documents evidencing when Amicon submitted coding work to Al.

As you know, all of these documents should have been produced months ago pursuant to the annexed document demand which was served on Plaintiffs in December 2012. See, e.g., Req. Nos. 4, 11. Kindly advise when Defendants can expect to receive these documents which are long overdue. Defendants reserve all rights regarding the foregoing.

Regards,

DJB

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